IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re U.S. Patent Application of:

Randolph Fowler TOTTEN Group Art Unit: 3692

Application No.: 10/058,318 Examiner: O. Oyebisi

Filing Date: January 30, 2002

Title: SYSTEM AND METHOD FOR

VALUING FINANCIAL ASSET SERVICES AND FINANCIAL ASSET SERVICE AGREEMENTS

MAIL STOP AMENDMENT Commissioner for Patents

PO Box 1450

Alexandria, VA 22313-1450

AMENDMENT AND RESPONSE TO OFFICE ACTION DATED OCTOBER 20, 2006

Sir:

In response to the Office Action dated October 20, 2006, Applicant respectfully requests reconsideration of the above-identified application in light of the amendments and remarks herein as follows:

IN THE CLAIMS: This section begins on Page 2.

REMARKS: This section begins on Page 5.